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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FELIX EFRAIN CHAVEZ, AND
DOUGLAS GALVAN,

Defendant.

No. 3-12-70315 NC

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE AND EXCLUDE
TIME UNDER S.T.A. AND F.R.C.R.P. 5.1

Date: July 19, 2013 to July 30, 2013
Time: 9:30 a.m.

The parties are currently scheduled to appear before the Court on July 19, 2013 for status. As of July 17, 2013, the parties reached an agreement that would resolve this matter as to both defendants. However, because the agreement was reached only two days before the next scheduled appearance, the parties will not be prepared to enter pleas on July 19, 2013.

The parties therefore request that this matter be continued for roughly one week, until July 30, 2013 for arraignment on an information before this Court. Depending on the practice of the District Court Judge assigned to this matter, the defendants will also be prepared to enter changes of plea on July 30, 2013. Courtesy copies of proposed plea agreements as to each defendant have therefore been provided to the Court.

1 The parties hereby stipulate that the time between July 19, 2013 and July 30, 2013 is
2 appropriately excluded from the running of the speedy trial clock under 18 U.S.C. 3161(h)(1)(G)
3 as plea agreements have been submitted for the Court's consideration. The parties further
4 stipulate that this time period shall be excluded from the applicable deadlines under F.R.Cr.P. 5.1
5 with each defendant's consent and for good cause.

6 SO STIPULATED.

8 DATED: July 18, 2013.

Respectfully submitted,
MELINDA HAAG
United States Attorney

10 /s/

11 BENJAMIN TOLKOFF
Assistant United States Attorney

12 DATED: July 18, 2013.

13 /s/

14 SARA REIF
Attorney for FELIX EFRAIN CHAVEZ

15 DATED: July 18, 2013.

16 /s/

17 LAUREL HEADLEY
Attorney for DOUGLAS GALVAN

19 For the reasons stated, for good cause shown and because the Court has taken proposed
20 plea agreements under consideration, this matter is hereby continued until July 30, 2013 and all
21 time between July 19, 2013 and July 30, 2013 is excluded from the running of the speedy trial
22 clock and the applicable time limits of F.R.Cr.P. 5.1.

23 SO ORDERED.

25 DATED: July 18, 2013.

26 
27 HONORABLE KANDIS A. WESTMORE
United States Magistrate Judge